

JOHN ASHCROFT

Governor

FREDERICK A. BRUNNER

Director



STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176
Jefferson City, MO 65102
314-751-3241

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks and
Historic Preservation

December 19, 1985

Mr. Robert H. Kaatman
Environmental Compliance
McDonnell Douglas Corporation
P.O. Box 516
St. Louis, Missouri 63116

Dear Mr. Kaatman:

RE: Emergency Directive for Reactive Wastes

In accordance with the imminent hazard responsibilities of the department (260.420 RSMo Supp. 1985), an emergency directive (10 CSR 25-7.011(1)(E)) to McDonnell Douglas Corporation, St. Louis, Missouri, is hereby reissued authorizing the transportation, temporary storage, and treatment of 948 pounds of explosive reactive waste, including a 100-gram cylinder of trimethylaluminum from McDonnell Douglas Electronics (MDEC). The waste (except for the trimethylaluminum from MDEC) is currently in storage at Building 16 of the McDonnell Douglas facility in St. Louis, Missouri. All of the waste will be detonated and/or thermally treated at the Bigsring Quarry in Bigsring, Missouri. GSX Services, Inc., of Reidsville, North Carolina will transport, store, and treat the waste.

The following conditions must be met under this emergency directive:

1. The detailed proposal by GSX Services, Inc., dated June 26, 1985, and supplemented by correspondence, dated July 29, August 2, 1985, October 8, 1985, and the agreement between GSX Services, Inc. and the quarry owner are incorporated by reference into this emergency directive, and shall constitute the approved activities under this directive.
2. All provisions of the Resource Conservation and Recovery Act (RCRA) emergency permit dated August 23, 1985, shall be followed. A copy of the RCRA emergency permit is attached and incorporated into this emergency directive.
3. McDonnell Douglas shall arrange a schedule of activities for waste transportation and treatment that is approved by the MDNR St. Louis Regional Office and shall provide the MDNR Waste Management Program twenty-four (24) hours notice prior to transportation of waste.

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USEPA, RCRA Branch



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4. Transportation of the waste shall be in accordance with all applicable Department of Transportation (DOT) regulations and shall not occur during periods of severe weather or other hazardous road conditions.
5. Results of the environmental monitoring, including analyses of residual material, shall be submitted to the department within sixty (60) days after the treatment has been completed.
6. If the residual waste from the thermal treatment is shown to be non-hazardous, a special waste disposal request should be submitted to the department in order to gain approval for disposal at a permitted sanitary landfill. A copy of the request form is enclosed.
7. McDonnell Douglas must meet the requirements of the Clean Air Act and the corresponding Air Pollution Control regulations contained in 10 CSR 10-3. McDonnell Douglas shall comply with all conditions of the open burning permit as identified in the August 30, and November 21, 1985, letters from Mr. F. Donald Maddox of the St. Louis Regional Office.

This emergency directive is effective December 19, 1985 through January 9, 1986. The department may terminate this authorization at any time without process if necessary to protect human health or the environment.

The notices and reports to be sent by McDonnell Douglas to the department should be directed to Mr. Tom Pauling, Waste Management Program, P. O. Box 176, Jefferson City, Missouri 65102. If you have any questions regarding this directive, you may contact Mr. Pauling at (314) 751-3241.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES



Frederick A. Brunner, Ph.D., P.E.
Director

FAB:tpm

Enclosure

cc: McDonnell Douglas Corp, Mr. Harold Rehkop
McDonnell Douglas Electronics, Mr. Joe Jansen
EPA Region VII, Mr. Joe Galbraith
GSX Services Inc., Mr. James Noles



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

AUG 23 1985

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

Mr. Robert H. Kaatman
Environmental Compliance
McDonnell Douglas Corporation
P.O. Box 516
St. Louis, Missouri 63116

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WASTE MANAGEMENT
PROGRAM

Dear Mr. Kaatman:

This is to confirm the issuance of an emergency Resource Conservation and Recovery Act (RCRA) Permit under 40 CFR 270.61 to McDonnell Douglas Corporation to remove, transport, and thermally treat approximately 17,000 units (859 pounds net explosive weight) of reactive waste (explosives) materials. These materials are in storage at Building 16 of the McDonnell Douglas Corporation facility in St. Louis, Missouri. The thermal treatment process will be conducted at the Bigspring Quarry in Bigspring, Missouri. The permit number is MOP000000204. The conditions under which these materials will be removed, transported, and thermally treated are as follows:

1. All activities will be in accordance with the proposal submitted to McDonnell Douglas Corporation by GSX Services, Inc., formerly Triangle Resource Industries, dated June 26 and July 29, 1985.
2. No reactive waste (explosives) that is in a deteriorating or shock sensitive condition may be included under this permit without express written permission by this Agency.
3. All improvements at the Bigspring Quarry will be completed before any reactive waste may leave the McDonnell Douglas Corporation facility in St. Louis. These improvements will include, but shall not be limited to: road repair, fencing, barriers, gate, and warning signs.
4. All packaging of the reactive waste material will be in accordance with appropriate Department of Transportation requirements.
5. Transportation of reactive waste material will be in refrigerated transports. The interior of these refrigerated transports must be maintained at an appropriate temperature to prevent a dangerous situation whenever reactive waste materials are in or on these transports.
6. All local governmental agencies will be notified at least 24 hours prior to the transportation of any reactive waste materials through their jurisdictions. All local regulations regarding routing, times, speeds, and other safety precautions must be observed.
7. No more than 20 pounds of net explosive weight may be treated at any one time at the treatment site.

8. Only properly designated personnel may be present on the site during any treatment operations.
9. Only treatment procedures stated in the proposal cited above may be used.
10. No thermal treatment of reactive waste may commence until barrier(s) to prevent contamination of the site due to run-off of fire fighting water or precipitation has been constructed at the treatment area of the site.
11. All environmental monitoring specified in the above proposal must be implemented. The results of this monitoring must be submitted to this Agency within 60 days after the treatment has been completed.
12. The treatment site must be adequately secured to prevent intrusion by unauthorized personnel until the environmental monitoring (including sampling and analysis of surface soils, etc.) has demonstrated that the area is free of contamination.
13. All personnel involved in the removal, transportation, and thermal treatment of this reactive waste must be adequately trained in the operation and must be thoroughly familiar with all regulations as they pertain to their portion of the operation.
14. Written notification and a summary of activities must be submitted to this Agency within 60 days after the treatment has been completed.
15. All appropriate safety precautions to prevent injury to personnel or releases of hazardous constituents to the environment must be observed.
16. Approval of the final schedule for the removal, transportation, and thermal treatment of the reactive wastes must be received from the St. Louis Regional Office of the Missouri Department of Natural Resources.

This permit shall be effective as of August 26, 1985, and shall remain in effect until October 10, 1985.

If you have any questions, please contact Joe Galbraith at (913) 236-2888.

Sincerely yours,


David A. Wagoner
for Director, Waste Management Division

cc: Paul Meiburger, MDNR ✓

OFFICE USE ONLY
CLASS. CODE

PLEASE PRINT OR TYPE
MISSOURI DEPARTMENT OF NATURAL RESOURCES
SPECIAL WASTE DISPOSAL REQUEST
(for non-hazardous wastes)

OFFICE USE ONLY
GENERATOR I.D. NO.
W
FILE IDENTIFICATION

I. GENERAL INFORMATION

DISPOSAL FACILITY	WASTE GENERATOR
Name: _____	_____
Address: _____	_____
City, State, Zip: _____	_____
Telephone Number: _____	_____
Permit Number: _____	_____
Contact Person: _____	_____

II. WASTE CHARACTERIZATION (To be completed by Generator)

A. Name of waste _____

B. Description of generation process _____

C. (Check One): (1) Solid, (2) Sludge (20% solids), (3) Slurry (20% solids), (4) Liquid (5% solids),
(5) Other - specify _____ pH _____ % Solids by weight _____
Flash Point _____ using Pensky-Martins Closed Cup (ASTM D-93-77) or Setaflash Closed Tester (ASTM Standard D-3278-73)
Specific gravity _____ Pumpable: Yes No
Odor: Yes No Free Fluid: Yes No

D. Was the waste ever classified or listed as hazardous? If so the previous Mo. waste I.D. number was _____.

E. Chemical composition (attach any additional analysis)

Major Components	Wt. %	Wt. %
1. _____	_____	4. _____
2. _____	_____	5. _____
3. _____	_____	6. _____

F. Source of chemical data _____

III. GENERATION RATE (To be completed by Generator)

Waste Generation is: Check One

A. Continual Average generation rate per month _____

B. Intermittent Rate _____

C. One Time Only Quantity _____

D. If A or B, indicate amount for immediate disposal _____

E. Units (Circle One): Tons Gals Pounds Cubic Yards Empty Containers _____ (Give no. & size)

IV. TRANSPORTATION (To be completed by Generator or Landfill Operator)

A. Containers used for transportation
(Check one): (1) Bulk (cubic yards), (2) Metal drums (gal) (3) Cases, cartons (size, number/case _____).
(4) Fiber drums (gal) (5) Other - specify _____

B. Type of vehicle:
(1) Tractor-trailer (2) Roll-off/Ligger, (3) Dump Truck, (4) Other _____

V. DISPOSAL TECHNIQUES (To be completed by Landfill Operator).

A. Separate trench burial.
1. Location on landfill site _____
2. Trench design previously approved by DNR? _____
3. Trench design approval being requested? _____

B. Codisposal with municipal waste on active fill face
1. Average daily quantity of municipal solid waste _____ tons or cubic yards.
2. Special waste to be unloaded at: Toe of working face _____
Top of working face _____

C. Other disposal Procedures - specify _____

VI. HANDLING PROCEDURES (To be completed by Generator)

Safety precautions during handling: Provide handling information supplied by product manufacturer, waste generator or from other sources describing the necessary measures that should be taken to protect personal safety, to control dusting or to insure fixed placement of the waste. This should include a description of materials not compatible with this waste.

VII. CERTIFICATION (To be completed by Generator and Landfill Operator)

I, the undersigned, submit this request to dispose of the named waste and certify that the information supplied by me herein is correct. I understand approval to dispose of the waste may be suspended if false information has been submitted or if the disposal operation is not carried out in a proper and legal manner.

Signature of landfill operator or authorized representative

Date

Print Name

I, the undersigned, submit this request to dispose of the named waste and certify that the waste named herein to the best of my knowledge is not a hazardous waste as defined by the Missouri Waste Management Law and Rules and that the information supplied by me is correct.

Signature of waste generator or authorized representative

Date

Print Name

Additional comments:

COPY

Send to: MISSOURI DEPARTMENT OF NATURAL RESOURCES
Waste Management Program
P.O. Box 1368
Jefferson City, Missouri 65102